

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION


MARC VEASEY, JANE HAMILTON,
SERGIO DELEON, FLOYD J. CARRIER,
ANNA BURNS, MICHAEL MONTEZ,
PENNY POPE, OSCAR ORTIZ, KOBY
OZIAS, JOHN MELLOR-CRUMLEY,
JANE DOE, JOHN DOE, LEAGUE OF
UNITED LATIN AMERICAN CITIZENS
(LULAC), and DALLAS COUNTY, TEXAS.

Plaintiffs,

 \mathbf{v}_i

RICK PERRY, Governor of Texas; and JOHN STEEN, Texas Secretary of State,

Defendants.



Case No. 2:13-cv-00193

**PLAINTIFFS', MARC VEASEY, ET. AL.
RULE 26 INITIAL DISCLOSURES**

Plaintiffs, Marc Veasey, Jane Hamilton, Sergio DeLeon, Floyd J. Carrier, Anna Burns, Michael Montez, Penny Pope, Oscar Ortiz, Koby Ozias, John Mellor-Crumley, Jane Doe, John Doe, League of United Latin American Citizens (LULAC), and Dallas County, Texas, (collectively “Plaintiffs”) make this Rule 26 Initial Disclosures as follows:

(a)(1)(A): The name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

Response:

1. Marc Veasey
Jane Hamilton

Sergio DeLeon
Floyd J. Carrier
Anna Burns
Michael Montez
Penny Pope
Oscar Ortiz
Koby Ozias
John Mellor-Crummey
Jane Doe
John Doe
League of United Latin American Citizens (LULAC)
Dallas County, Texas

The above referenced names and entities are Plaintiffs in the Veasey case.

United States of America

Consolidated Plaintiffs

2. Rick Perry, Governor of Texas and
John Steen, Texas Secretary of State,
State of Texas,

The above referenced individuals and the State of Texas are Defendants.

Steve McGraw

Consolidated Defendants

3. Texas Association of Hispanic County Judges and County Commissioners
and Maria Longoria Benevides
Texas League of Young Voters Education Fund and Imani Clark
Texas State Conference of NAACP Branches
Mexican American Legislative Caucus of the Texas House of
Representatives

The above referenced individuals and entities are Plaintiff Intervenors.

5. True the Vote, and officers or members of the organization

The above referenced entity has moved to intervene as a Defendant.

6. Current and former officials, employees, and counsel of the State of Texas — including but not limited to the Texas Secretary of State's Office, the Texas Division of Elections, the Texas Department of Public Safety, other Texas offices responsible for various forms of accepted identification and for documentation necessary for obtaining accepted identification, and Texas county election officials — will likely have discoverable information regarding (a) the administration of elections in Texas, (b) the various forms of identification in Texas, procedures for obtaining such identification and necessary documentation for obtaining identification, (c) the history, development, enactment, and implementation plans for implementation of S.B. 14. (d) the actual implementation of the Voter ID law in Texas beginning on or about June 26th, 2013.
7. Persons who testified in the legislative proceedings related to S.B. 14 will likely have discoverable information regarding the administration of elections in Texas and the history, development, enactment, and plans for and actual implementation of S.B. 14.
8. Current and former Texas state legislators and legislative staff will likely have discoverable information related to the history, development, enactment, and plans for and actual implementation of S.B. 14.
9. Persons who submitted comments to the Attorney General, or otherwise talked to representatives from the Department of Justice during the Attorney General's administrative review of S.B. 14 pursuant to Section 5 of the Voting Rights Act, 42 U.S.C. § 1973c ("Section 5"), will likely have discoverable information related to the history, development, enactment, plans for implementation, and possible effects of S.B. 14.

10. Current and former officials, employees, and counsel of the individual county clerks and/or election administration offices of the 254 counties in Texas responsible for administering elections — will likely have discoverable information regarding (a) the administration of elections in Texas, before and after the implementation of the Voter ID law in Texas; (b) the various forms of identification in Texas, procedures for obtaining such identification and necessary documentation for obtaining identification; (c) the history, development, enactment, and implementation plans for implementation of S.B. 14; and (d) the actual implementation of the Voter ID law in Texas beginning on or about June 26th, 2013.
11. Sandra Lee Watts
Nueces County Courthouse,
901 Leopard St, Suite 904
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Sheila Korte
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Carol Anderson

Dorothy Card

Chuck Elkins

Ismael Morin

Linda Britten

James Claude Wright, Jr. aka Jim Wright

Lesley Evans

Stephanie Cochran

Jonathan Bernstein

Kendall McCook
Fort Worth, TX

Janine Cicadas

Bartle Doo

Juan Quiroz
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Leah McInnis

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Sara Horn

Jane Johnson

Attorney General Greg Abbott

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The people referenced above are believed to be Texas voters who are likely to have information about relevant issues, including problems that they as voters have had, or will have, exercising their voting rights under the new voter ID law. Some of these individuals have contacted Plaintiffs' counsel directly. Some of these individuals have been referred to Plaintiffs' counsel by individuals or organizations and some have been reported to have encountered voting problems in the print press or other media reports. Addresses and phone numbers currently known to Plaintiffs have been provided. Plaintiffs reserve the right to supplement these disclosures with additional names of individuals as well as with addresses and phone numbers.

John Stafford
(409) 866-6907

Joseph McBride
(210) 882-7122

Terry Combs

Marianna Cline
Houston TX

John Oldham
Fort Bend TX

Dana DeBeauvoir
Travis County Clerk
P O Box 149325
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(512) 854-9188

Cathy Courtney

Jacque Callanen
Bexar County

Stan Stanart
Harris County Clerk
P O Box 1525
Houston TX 77251
(713) 755-6411

Stelena Evans

Dorie Cranshaw

David Rosen

Hazel Weathers

Rochelle Lyon

Dan Teed (the Harrison County Elections Administrator)

The people referenced above are election officials, election judges or clerks who are likely to have information about relevant issues, including problems that voters have had, or will have, voting under the new voter ID law and problems that elections administrators and personnel have had, or will have, implementing or administering the new voter ID law. Some of these individuals have contacted Plaintiffs' counsel directly. Some of these individuals have been referred to Plaintiffs' counsel by individuals or organizations and some have been reported to have encountered voting problems in the print press or other media reports. Addresses and phone numbers currently known to Plaintiffs have been provided. Plaintiffs reserve the right to supplement these disclosures with additional names of individuals as well as with addresses and phone numbers.

Anna Olivares

David Miller

LaKashia Wallace

Stacie B. Royster

Sondra Haltom
Empower the Vote

The people referenced above are Texas community organizers and community leaders who are likely to have information about relevant issues, including problems that voters have had, or will have, voting under the new voter ID law and problems that elections administrators and personnel have had, or will have, implementing or administering the new voter ID law. Some of these individuals have contacted Plaintiffs' counsel directly. Some of these individuals have been referred to Plaintiffs' counsel by individuals or organizations and some have been reported to have encountered voting problems in the print press or other media reports. Addresses and phone numbers currently known to Plaintiffs have been provided. Plaintiffs reserve the right to supplement these disclosures with additional names of individuals as well as with addresses and phone numbers.

(a)(1)(B): A copy of, or a description by category and location of, all documents, data, compilations, and tangible things that are in the possession, custody, or controls of the party and the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Response: (1) The following preclearance submissions made to the United States Attorney General pursuant to Section 5 of the Voting Rights Act:

1. Submission No. 2012-0122
2. Submission No. 2011-2775
3. Submission No. 2011-5073
4. Submission No. 2011-5552

(2) Satellite map data showing location of Texas DPS offices in relation to minority and/or rural and/or urban populations in numerous counties including but not limited to Harris, Dallas and Bexar counties.

(3) Declarations of Marc Veasey, Sheila Korte, Evelyn Brickner Floyd Carrier and Peggy Draper Herman attached as Exhibits 1-5.

(a)(1)(C): A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including material bearing on the nature and extent of damages.

Response: Plaintiffs are entitled to recover their reasonable and necessary court costs, expert fees and attorneys' fees to be described more fully in discovery, expert designations, and future court filings.

(a)(1)(D): Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment, which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Response: None.

Dated this _____ day of November, 2013.

Respectfully submitted,

BRAZIL & DUNN

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CERTIFICATE OF SERVICE

I hereby certify that on November 21st, 2013, I served a true and correct copy of the foregoing via electronic mail on the following counsel of record:

/s/ Chad W. Dunn
Chad W. Dunn